



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE  
GOVERNOR

PATRICIA W. AHO  
COMMISSIONER

**Hancock Lumber Company, Inc.  
Cumberland County  
Casco, Maine  
A-629-71-M-M (SM)**

**Departmental  
Findings of Fact and Order  
Air Emission License  
Amendment #2**

**FINDINGS OF FACT**

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

**I. REGISTRATION**

**A. Introduction**

Hancock Lumber Company, Inc. (Hancock Lumber) was issued Air Emission License A-629-71-K-R on October 21, 2011 permitting the operation of emission sources associated with their lumber manufacturing facility. The license was subsequently amended on April 17, 2014 (A-629-71-L-A).

Hancock Lumber has requested a minor revision to their license in order to add a seventh kiln. No increase in facility-wide kiln throughput has been requested.

The equipment addressed in this license is located at 1260 Poland Spring Road in Casco, Maine.

**B. Emission Equipment**

The following equipment is addressed in this air emission license:

**Process Equipment**

Equipment/Process	Production Rate	Control Device(s)	Stack #
Kilns (7)	32.0 MMBF/yr	None	Fugitive

AUGUSTA  
17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
(207) 287-7688 FAX: (207) 287-7826  
RAY BLDG., HOSPITAL ST.

BANGOR  
106 HOGAN ROAD, SUITE 6  
BANGOR, MAINE 04401  
(207) 941-4570 FAX: (207) 941-4584

PORTLAND  
312 CANCO ROAD  
PORTLAND, MAINE 04103  
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04769  
(207) 764-0477 FAX: (207) 760-3143

C. Application Classification

This amendment will not increase licensed emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license, the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). Separate control requirement categories exist for new and existing equipment.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in *Definitions Regulation*, 06-096 CMR 100 (as amended). BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Kilns

Hancock Lumber has added a kiln, for a total of seven kilns, for drying eastern white pine lumber. Heat for the kilns is provided by Boilers #2 and/or #3. Hancock Lumber is currently limited to a yearly throughput limit on the kilns of 32.0 million board feet (BF) per year, based on a twelve-month rolling total. No increase in the annual throughput limit has been requested.

VOC emissions released from the kilns during drying have been estimated using data from studies conducted by the National Counsel of the Paper Industry for Air and Stream Improvement (NCASI) and the University of Maine. VOC emissions from the drying of eastern white pine in the kilns were calculated using a factor of 2.26 lbs/1000BF.

An emission factor of 2.26 lbs/1000BF, an annual throughput limit of 32.0 million BF/year and the opacity limit below are determined to be BACT for the kilns.

Visible emissions from the kilns shall not exceed 20% opacity on a six-minute block average, except for no more than one six-minute block average in a one-hour period.

C. Annual Emissions

1. Total Annual Emissions

Hancock Lumber shall be restricted to the following annual emissions, based on a 12 month rolling total. The tons per year limits were calculated based on the following:

- A fuel limit of 200,000 gal/year of #2 fuel oil in Boiler #2
- Firing Boiler #3 for 8760 hours per year.
- A throughput of 32.0 MMBF/year in the kilns.

**Total Licensed Annual Emissions for the Facility**  
**Tons/year**  
(used to calculate the annual license fee)

	<b>PM</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>2</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>VOC</b>
Boiler #2	1.7	1.7	7.0	4.9	0.5	0.1
Boiler #3	14.2	14.2	1.2	10.4	28.4	0.8
Kilns	—	—	—	—	—	36.2
<b>Total TPY</b>	<b>15.9</b>	<b>15.9</b>	<b>8.2</b>	<b>15.3</b>	<b>28.9</b>	<b>37.1</b>

2. Greenhouse Gases

Greenhouse gases are considered regulated pollutants as of January 2, 2011, through 'Tailoring' revisions made to EPA's *Approval and Promulgation of Implementation Plans*, 40 CFR Part 52, Subpart A, §52.21 Prevention of Significant Deterioration of Air Quality rule. Greenhouse gases, as defined in 06-096 CMR 100 (as amended), are the aggregate group of the following gases: Carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. For licensing purposes, greenhouse gases (GHG) are calculated and reported as carbon dioxide equivalents (CO<sub>2</sub>e).

Based on the facility's fuel use limit(s), the worst case emission factors from AP-42, IPCC (Intergovernmental Panel on Climate Change), and *Mandatory Greenhouse Gas Reporting*, 40 CFR Part 98, and the global warming potentials contained in 40 CFR Part 98, Hancock Lumber is below the major source threshold of 100,000 tons of CO<sub>2</sub>e per year. Therefore, no additional licensing requirements are needed to address GHG emissions at this time.

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ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-629-71-M-M subject to the conditions found in Air Emission License A-629-71-K-R, in amendment A-629-71-L-A, and in the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

**In light of the above Findings, the Department determines that this amendment does not require changes to any license Conditions.**

DONE AND DATED IN AUGUSTA, MAINE THIS 13 DAY OF August, 2014.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: Marc Allen Robert Cone for  
PATRICIA W. AHO, COMMISSIONER

**The term of this amendment shall be concurrent with the term of Air Emission License A-629-71-K-R.**

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 7/16/14

Date of application acceptance: 7/16/14

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Poland, Bureau of Air Quality.

